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From: **Andrew Rosenzweig** Andrew.Rosenzweig@nelsonmullins.com  
Subject: Newson v. C. R. Bard, Inc., Member Case of IN RE: Bard IVC Filters Products Liability Litigation, Amended Complaint in Violation of FRCP 15  
Date: June 13, 2017 at 11:17 AM  
To: trobenalt@robenaltlaw.com, jcolon@robenaltlaw.com  
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Counsel:

On June 13, 2017 you filed an amended complaint for Michael and Iris Newson without leave of court or Bard's consent in violation of Federal Rule of Civil Procedure 15. Please withdraw plaintiffs' improperly filed amended complaint within 10 days from receipt of this email or Bard will move to strike it. If the only amendments to plaintiffs' complaint are changing the product from G2 to Meridian and changing the implant date from January 19, 2012 to January 18, 2012, then you may represent to the court that Bard consents to plaintiffs' filing of a new amended complaint.

Thank you and please let me know if you have any questions or concerns.

Andrew

## Nelson Mullins

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